

REMARKS

Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks. Applicants have carefully reviewed and considered the Office Action mailed on December 29, 2006, and the references cited therewith.

Claims 57-60 and 62 are pending in this application.

As an initial matter, Applicants note that the parent cases of the subject application, Appln. Nos. 09/757,265 (U.S. Patent No. 6,501,234) and 10/299,206 (U.S. Patent No. 6,707,264), are currently under reexamination (Reexam Nos. 90/008,170 and 90/008,175). Also, the two patents that correspond to the parent applications are currently involved in litigation (Case Nos. 2:05-cv-00211 and 2:04-cv-00323). Included herewith is an Information Disclosure Statement that includes information known to date, including information related to the aforementioned reexams and litigation.

Claims 57-60 and 62 were rejected under 35 USC § 102(a) as being anticipated by Reeves et al (U.S. Patent No. 6,426,611). Applicants respectfully traverse this rejection.

Reeves appears to disclose a feedback control circuit for controlling the AC power to a number of lamps using one AC source. Reeves seems to address the need to provide an essentially constant rms voltage to an unknown number of lamps located an unknown distance from the power supply (e.g., transformer). See Reeves, cols 1-2. Without this control the voltage-dependent light output of the lamps depends on both the number of lamps and the length of the wires between the power source and each lamp. Applicants respectfully submit that this differs from the Applicants' pending claims.

For example, Applicants' presently pending independent claim 57 is provided below for the Examiner's convenience.

57. A method, comprising:
- generating a plurality of phase-shifted burst mode signals;
 - regulating power to a plurality of loads using respective said phase shifted burst mode signals;
 - generating a plurality of AC signals based at least in part on a respective phase-shifted burst mode signal; and
 - supplying respective AC signals to respective loads.

Thus, Applicants' claim 57 requires "generating a plurality of phase-shifted burst mode signals" and "generating a plurality of AC signals based at least in part on a respective phase-shifted burst mode signal." In addition, claim 57 requires "supplying respective AC signals to respective loads." Thus, each load receives a separate AC signal generated by respective phase-shifted burst mode signals.

In contrast, it is Applicants' understanding that Reeves discloses circuitry to control the phase of a single AC signal. Referring to the circuitry of Figure 3 of Reeves (and the description thereof), it appears that the Phase Controller 310 is used as a timer for the Power Switch 302. The output of the Phase Controller 310 is a timer signal 324. The input of the Power Switch 302 is a 20V AC signal 312. The output of the Power Switch 302 is a phase delayed power output signal 332. Phase Controller 310 controls the amount of phase in the output signal 332. Importantly, the single phase delayed power output signal 332 is used to supply power to a plurality of lamp loads 114, 116 and 118. Thus, it appears that Reeves teaches that power to each lamp is not individually controlled, rather, a single phase delayed power signal is used to power a plurality of loads.

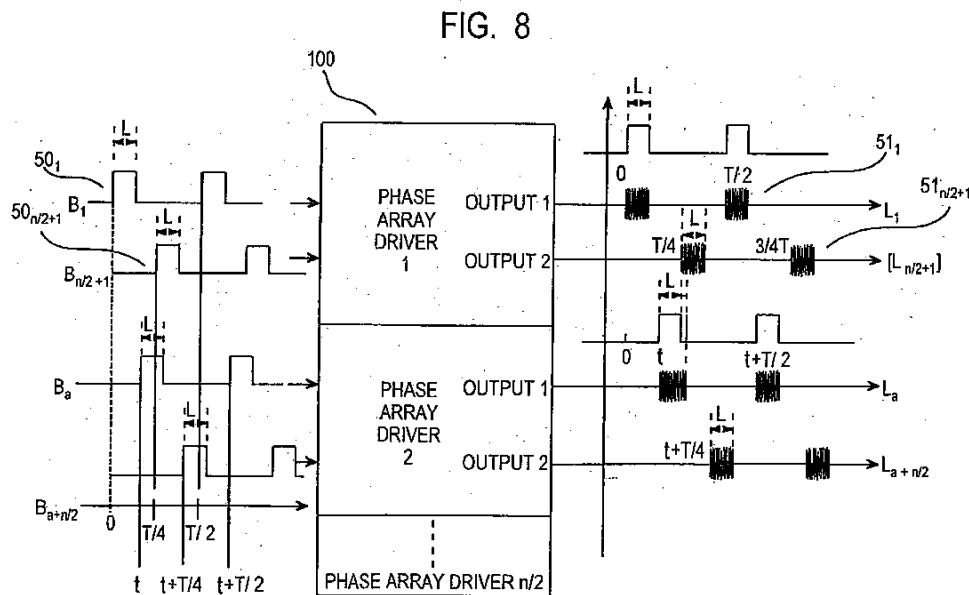
Similarly, referring to the circuitry of Figure 4 of Reeves (and the description thereof), it appears that Pulse Width Modulating Controller 402 is operating as described above with reference to 302 in that the output of 402 is a timing signal 324. The phase-delay described in Reeves indicates that the power transistor used to drive the plurality of lamps is turned on for only a portion of the cycle of the AC supply voltage.

Applicants respectfully submit that the phase delay circuitry provided by Reeves is very different from the requirements of Applicants claim 57. Reeves appears to disclose generating a single phase delayed power signal to power a plurality of loads. Claim 57, in contrast requires:

- Regulation of a plurality of loads using respective phase-shifted burst mode signals;
- Generating a plurality of AC signals using respective phase-shifted burst mode signals; and
- Supplying respective AC signals to respective loads.

Figure 8 of the subject application discloses a diagram of an exemplary embodiment of a phase array driver, a description of which is provided below for the Examiner's convenience.

FIG. 8 shows a top-level diagram of exemplary phase array drivers 100. In an exemplary configuration, each phase array driver, Driver 1, Driver 2, . . . , Driver $n/2$, receives two phased burst signals as inputs, and outputs power to two respective loads. The regulation of power to each load is independent of the regulation of power to the other loads. Therefore, alternative configurations allow for each phase array driver 100 to regulate any number of loads totaling more or less than as depicted in the figures. In an exemplary system, each phase array driver 100 receives two phased burst signals 50 which are 180.degree. out of phase and generates two power regulating signals 51 which are 180.degree. out of phase. Phase array drivers 100 translate each variable pulse width L into a duration for which a respective load stays on in each cycle. Therefore, the greater the pulse width of a phased burst signal, the greater the power delivered to the respective load during each cycle. Also each load turns on and off at the burst frequency defined by the respective phased burst signal 50. Since driver 1100 receives complementary signals in the exemplary system, the number of phased burst signals 50 is even for this embodiment. (Emphasis added).



Thus, Applicants respectfully submit that Reeves does not disclose generating a plurality of phase-shifted burst mode signals, regulating power to a plurality of loads using respective said phase shifted burst mode signals, generating a plurality of AC signals based at least in part on a respective phase-shifted burst mode signal, and supplying respective AC signals to respective loads as required by Applicants independent claim 57. Therefore, Applicants respectfully submit that independent claim 57 is patentable over Reeves and is therefore in condition for allowance.

Since claims 58-60 and 62 depend, either directly or indirectly, upon Applicants' independent claim 57, Applicants respectfully submit that these claims are in condition for allowance as well.

Claim 60 stands rejected under 35 USC 103 as being unpatentable over Reeves. Applicants respectfully submit this rejection is in error.

Claim 60 depends from claim 57. The deficiencies of Reeves vis-à-vis claim 57 are discussed above in detail. Thus, since claim 57 should be allowable over Reeves, claim 60 should likewise be allowable. No further discussion of this rejection is believed necessary.

Having dealt with all the objections raised by the Examiner, it is respectfully submitted that the present application, as amended, is in condition for allowance. Thus, early allowance is earnestly solicited.

If the Examiner desires personal contact for further disposition of this case, the Examiner is invited to call the undersigned Attorney at 603.668.6560.

In the event there are any fees due, please charge them to our Deposit Account No. 50-2121.

Respectfully submitted,
Lin et al.

By their Representatives,

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AMENDMENT D

Serial Number: 10/802,901

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Title: SEQUENTIAL BURST MODE ACTIVATION CIRCUIT

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